

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re:)
)
)

LINK DEVELOPMENT, LLC,)
)

Debtor)
_____)

Chapter 11
Case No. 09-14435-WCH

ROBERT WALLACE, TRUSTEE OF THE BD LENDING TRUST'S LIMITED OBJECTION
TO THE DEBTOR'S MOTION FOR AUTHORITY TO ENTER INTO A SETTLEMENT
AGREEMENT

Robert Wallace, Trustee of the BD Lending Trust, a creditor in the within Bankruptcy,
hereby files his Limited Objection to the Debtor's Motion.

As grounds therefore, Wallace, Trustee, states as follows:

1. Wallace echoes the objection of the US Trustee's Office to this Motion that this
Court ought not authorize the Debtor to enter into a settlement agreement without disclosure of
the terms; and

2. Wallace remains prepared to enter into the settlement agreement that was
contemplated at the mediation and negotiated by the parties but where to Debtor's Motion does
not specify what agreement and what terms Wallace is not prepared to agree to be bound.

Wherefore, Robert Wallace, Trustee of the BD Lending Trust, a creditor in the within Bankruptcy, respectfully requests that this Court issue an Order denying the Debtor's Motion in the form presented but that the denial be without prejudice to the Debtor seeking authority to enter into the settlement agreement that was negotiated by the parties prior to the filing of the involuntary bankruptcy petition.

Respectfully submitted,
Robert V. Wallace, Jr.,
Trustee of the BD Lending Trust,
By his attorney,

/s/ Jeffrey B. Loeb
Jeffrey B. Loeb, BBO #546916
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Dated: November 16, 2009

CERTIFICATE OF SERVICE

The undersigned hereby certifies that I served a copy of the foregoing: Robert Wallace, Trustee of the BD Lending Trust's Limited Objection to the Debtor's Motion for Authority to Enter into a Settlement Agreement, on all of those who have filed electronic appearances in this matter.

/s/ Jeffrey B. Loeb
Jeffrey B. Loeb

Dated: November 16, 2009